## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	) Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., et al.,	) Chapter 11
Debtors.	) (Jointly Administered)
ALFRED H. SIEGEL, AS TRUSTEE OF THE CIRCUIT CITY STORES, INC. LIQUIDATING TRUST,	) ) Adv. Proc. No. 10- 03240 )
Plaintiff,	)
v.	)
SUN CONSTRUCTION GROUP, INC. A/K/A SUN CONSTRUCTION GROUP-GA,	) ) )
Defendant.	) )

## MOTION PURSUANT TO LBR 2090-1(E)(2) <u>FOR ADMISSION PRO HAC VICE</u>

COMES NOW John C. Smith ("Movant") of DurretteBradshaw PLC, a member in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and hereby moves the Court pursuant to this Motion (the "Motion") for the entry of an Order substantially in the form of Exhibit "A" authorizing Christopher S. Strickland ("Mr. Strickland"), a lawyer whose address

Christopher S. Strickland (pro hac vice request pending) Levine, Block & Strickland LLP Centrum at Glenridge 780 Johnson Ferry Road, Suite 240 Atlanta, Georgia 30342

Telephone: (404) 231-4675 Fax: (404) 231-4005

Counsel for Sun Construction Group, Inc.

John C. Smith (VSB # 44556) DurretteBradshaw PLC Bank of America Center, 1111 East Main Street, 16<sup>th</sup> Floor Richmond, VA 23219 Telephone: (804) 775-6900

Fax: (804) 775-6911 Local Counsel is 780 Johnson Ferry Road, Suite 240, Atlanta, Georgia 30342, to appear and practice *pro hac vice* on behalf of Sun Construction Group, Inc., the named Defendant in the above-captioned matter now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related litigation or proceedings pursuant to LBR 2090-1(E)(2). In support of this Motion, the Movant states as follows:

- 1. Mr. Strickland is admitted, practicing and in good standing as a member of the bar of the State of Georgia. He is admitted to practice before the United States District Court for the Northern District of Georgia and the Southern District of Georgia. Mr. Strickland has been practicing law since 1995. There are no disciplinary proceedings pending against Mr. Strickland.
- 2. Pursuant to LBR 2090-1(E)(2), "an attorney from another State . . . may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar."
- 3. Movant requests the Court to allow Mr. Strickland to file pleadings and to appear at hearings in these Chapter 11 cases.
- 4. Notice of this Motion has been given to the Plaintiff. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is required.
  - 5. An Application pursuant to LBR 2090-1(E)(2)(a) is attached as Exhibit "B."

**WHEREFORE**, the Movant respectfully requests that the Court enter an Order, substantially in the form attached as Exhibit "A" (a) authorizing Mr. Strickland to appear and practice *pro hac vice* on behalf of Sun Construction Group, Inc. and (b) granting such other and further relief as is just and proper.

Dated: January 14, 2011 Respectfully submitted,

/s/ John C. Smith.

John C. Smith (VSB # 44556)

**DurretteBradshaw PLC** 

1111 East Main Street, 16th Floor Richmond, Virginia 23219 (804) 775-6900 Telephone (804) 775-6911 Facsimile

and

Christopher S. Strickland, Esq. (pro hac pending) LEVINE, BLOCK & STRICKLAND LLP Centrum at Glenridge 780 Johnson Ferry Road, Suite 240 Atlanta, Georgia 30342 Telephone: (404) 231-4675

Fax: (404) 231-4005

Counsel to Defendant Sun Construction Group, Inc.

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Lynn L. Tavenner, Esq.
Paula S. Beran, Esq.
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219

/s/ John C. Smith

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EXHIBIT A

### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., et al.,	Chapter 11
Debtors.	(Jointly Administered)
ALFRED H. SIEGEL, AS TRUSTEE OF ) THE CIRCUIT CITY STORES, INC. ) LIQUIDATING TRUST,	Adv. Proc. No. 10- 03240
Plaintiff, )	
v. )	
SUN CONSTRUCTION GROUP, INC. ) A/K/A SUN CONSTRUCTION ) GROUP-GA, )	
Defendant.	

# ORDER GRANTING MOTION PURSUANT TO LBR 2090-1(E)(2) FOR ADMISSION PRO HAC VICE

Upon the Motion (the "Motion") of John C. Smith, for the admission *pro hac vice* of Christopher S. Strickland ("Mr. Strickland") a lawyer whose address is 780 Johnson Ferry Road, Suite 240, Atlanta, Georgia 30342; it appearing that the relief requested is in the best interests of the Debtors' estates, their creditors and other parties in interest; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§157 and 1334;

Christopher S. Strickland (pro hac vice request pending)
Levine, Block & Strickland LLP
Centrum at Glenridge
780 Johnson Ferry Road, Suite 240
Atlanta, Georgia 30342
Telephone: (404) 231-4675

Fax: (404) 231-4005

Counsel for Sun Construction Group, Inc.

John C. Smith (VSB # 44556) DurretteBradshaw PLC Bank of America Center, 1111 East Main Street, 16<sup>th</sup> Floor Richmond, VA 23219 Telephone: (804) 775-6900 Fax: (804) 775-6911 Local Counsel consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. §157(b); venue being proper before this Court pursuant to 28 U.S.C. §\$1408 and 1409; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED:

- 1. The Motion is GRANTED.
- 2. Mr. Strickland is authorized to appear and practice *pro hac vice* as counsel to Sun Construction Group, Inc., in the above-captioned matter and all related proceedings.
- 3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
- 4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

ENTERED:	
	United States Bankruptcy Court Judge

ENTERED ON DOCKET:

/s/John C. Smith

John C. Smith (VSB # 44556)

DurretteBradshaw PLC

1111 East Main Street, 16th Floor

Richmond, Virginia 23219

(804) 775-6900 Telephone

(804) 775-6911 Facsimile

Local Counsel for Sun Construction Group, Inc.

### LBR 9022-1(C)(1) Certification

I hereby certify that the foregoing proposed order has been endorsed by all necessary parties.

/s/John C. Smith

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#### COPIES TO:

John C. Smith, Esq. DURRETTEBRADSHAW PLC 1111 East Main Street, 16th Floor Richmond, Virginia 23219

Lynn L. Tavenner, Esq.
Paula S. Beran, Esq.
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219

**EXHIBIT B** 

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#### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

# APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653 (KRH) ,* Case Name In re Circuit City Stores, Inc., et al.,
PERSONAL STATEMENT
FULL NAME (no initials, please) Christopher S. Strickland
Bar Identification Number 687277 State Georgia
Firm Name Levine, Block & Strickland LLP
Firm Phone # 404-231-4567 Direct Dial # 404-231-4675 FAX # 404-231-7005
E-Mail Address cstrickland@lbslaw.net
Office Mailing Address 780 Johnson Ferry Road, Suite 240, Atlanta, Georgia 30342  Name(s) of federal court(s) in which I have been admitted N.D. Ga. and S.D. Ga. (and multiple pro hac admissions nationwide)
Name(s) of federal count(s) in which I have been admitted N.D. Oa. and shuttiple pro fac admissions nationwide)
I certify that the rules of the federal court in the district in which I maintain my office extend a similar pro hac vice admission privilege to members of the bar of the Eastern District of Virginia.
I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.
I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.  (Applicant's Signature)
I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant pro hac vice.  (Signature)  (Date)  (Typed or Printed Name)
*Pro hac vice admission in a case shall include an adversary proceeding(s) in the case.